



## State of New Jersey

DEPARTMENT OF AGRICULTURE  
33 W. State Street  
PO Box 334  
TRENTON NJ 08625-0334

RICHARD J. CODEY  
*Acting Governor*

CHARLES M. KUPERUS  
*Secretary*

July 5, 2005

Re: Docket ID APHIS-2005-0044, National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards

To Whom It May Concern:

The State of New Jersey Department of Agriculture has these concerns regarding the above mentioned draft documents.

### **Stages of Development**

Although, as described, "the concept of using states of progress as a way of measuring national implementation is not new" the draft proposal does not allow for flexibility required by states for such implementation. The NAIS plan should identify goals and objectives, but not limit the state by requiring specific standards that would be inappropriate or inconsistent with routine state functionality. If a stage system is to be used it should be based on the performance of the state (i.e. the amount of premises, participants, producers, animals and movements recorded as a percent of the states' estimated actual numbers). Also it is unrealistic to expect 100 percent of premises to be captured as called for in Stage V. A large number of premises will have animals that never move from the home premise to anything but slaughter, previous documents from the USDA indicated that animals that never move from the farm of origin or animals that move to slaughter directly from the farm of origin do not need an individual animal ID. Therefore those premises will not have a need for a premise ID.

### **Timeline**

The timeline is aggressive, but should be possible, as long as the USDA can give the state agencies enough time to get their respective plans implemented. If the USDA only rolls out their part in January 2009, than they cannot expect the states to also be ready on January 2009. It would be safe to say that the states will need at least a year to implement the program after the USDA has delivered.

The Premise Registration should be mandatory on an earlier time frame than the Animal ID part of the system. Currently the strategic plan calls for both to become mandatory on January 2008.

### **Privacy**

"...the USDA cannot assure the confidentiality of all the information [collected with the NAIS] at the present time." Until confidentiality can be guaranteed stakeholder participation will suffer.

On Behalf of the New Jersey Department of Agriculture



Sebastian Reist  
Senior Veterinarian

New Jersey Department of Agriculture  
Division of Animal Health  
P.O. Box 330  
John Fitch Plaza  
Trenton, NJ 08625

Phone: (609) 292-3965  
Fax: (609) 633-8633  
e-mail: [sebastian.reist@ag.state.nj.us](mailto:sebastian.reist@ag.state.nj.us)